



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

MAY 09 2012

UPS

Mr. David Keith  
Project Coordinator  
Anchor QEA, LLC  
614 Magnolia Avenue  
Ocean Springs, MS 39654

RE: Draft Sampling and Analysis Plan: TCRA Cap Porewater Assessment  
San Jacinto River Waste Pits Superfund Site, Harris County, Texas  
Unilateral Administrative Order, CERCLA Docket No. 06-03-10

Dear Mr. Keith:

The U.S. Environmental Protection Agency (EPA) and other agencies have completed their reviews of the above referenced document dated April 2012. The EPA approves this document with the following modifications:

1. **(Section 1.2, p. 1-15):** The plan shall discuss whether the analysis result is expected to over or under estimate the pore water concentrations, and why.
2. **(Section 1.4.1, p. 1-6, or other appropriate section):** The plan shall provide the permittivity (geotextile thickness x permittivity = geotextile permeability) and pore size specifications for the porous geotextile fabric
3. **(Section 1.4.1, p. 1-7):** The sentence "A full description of the TCRA implementation is provided in the Draft Removal Action Completion Report (Anchor QEA 2011)" shall be deleted.
4. **(Section 1.6, p. 1-11, or other appropriate section):** The plan shall include a discussion of the analytical method detection limits' adequacy to achieve the goals of this sampling.
5. **(Section 1.6.1.2, p. 1-13):** The plan shall describe the rational for the number and location of the performance reference compound (PRC) samplers. The plan shall also describe the rational for not including any regular samplers in the D cap area with a thickness of 24 inches. Further, the plan shall describe the rational for the number and location of the surface water samplers.
6. **(Section 1.6.2.1, p. 1-17):** The sentence "This qualitative evaluation will provide for a spatially refined description of cap performance, so that the feasibility study can address specific enhancements of the cap, if any are needed" shall be deleted.
7. **(Section 1.6.2.1, p. 1-17):** The reference for the "Anchor QEA (2012)" citation -shall be provided in the list of references.
8. **(Section 1.6.2.3, p. 1-18):** The sentence "Such a finding would indicate that the cap is effective, and that enhancements or in situ treatment are not necessary for the final remedy" shall be deleted.

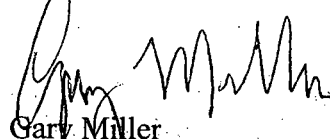


9. **(Section 2.2, p. 2-3, or other appropriate section):** The plan shall include a procedure for dealing with obstructions during placement of the sampling devices.
10. **(Figure 1-9):** This figure shall show the division between the eastern and western cells.

Please provide copies of the final document and proceed with the implementation of these plans in accordance with the approved schedule.

Please contact me at (214) 665-8318, or by email at [miller.garyg@epa.gov](mailto:miller.garyg@epa.gov) if there are any questions or comments.

Sincerely,



Gary Miller  
Remedial Project Manager

cc: Luda Voskov (TCEQ)  
Bob Allen (Harris County)  
Linda Henry (Port of Houston)  
Jessica White (NOAA)

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mgm 5/9/12

miller:5/8/12:r:\superfund\oversight\san jac cap porewater approval with mods 5-9-12

  
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